

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION**

CERTAIN UNDERWRITERS AT LLOYD'S,  
LONDON subscribing to Policy TBT002154,

Plaintiffs,

vs.

MISSY'S LOUNGE, LORRAINE HUNT,  
Individually, and Doing Business as MISSY'S  
LOUNGE, EUGENE HABERSHAM,  
Individually, and as Lessor of MISSY'S  
LOUNGE, and THE ESTATE OF  
WOODROW BRANTLEY, by Diane  
Brantley, his Personal  
Representative,

Defendants.

**CIVIL ACTION NUMBER: 9:10-CV-1864-SB**

**PLAINTIFF'S ANSWERS TO LOCAL  
RULE 26.01 INTERROGATORIES**

Plaintiffs Certain Underwriters at Lloyd's, London subscribing to Policy TBT002154 ("Plaintiffs") hereby provide the following answers to Local Rule 26.01 Interrogatories:

A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:**

None.

B) As to each claim, state whether it should be tried by jury or non-jury and why.

**ANSWER:**

The matter should be tried by non-jury because it involves questions of law.

(C) State whether the party submitting these responses is a publicly owned company and separately identify:

(a) Each publicly owned company of which it is a parent, subsidiary, partner or affiliate;

(b) Each publicly owned company which owns 10% or more of the outstanding shares or other indicia of ownership of the party; and

(c) Each publicly owned company in which the party owns 10% or more of the outstanding shares.

**ANSWER:**

The subscribing Underwriter at Lloyd's is Syndicate 2987. Brit Syndicates Limited is the managing agent for Syndicate 2987. Brit Syndicates Limited's address is 55 Bishopsgate, London EC2N 3AS. The only Corporate member for Brit Syndicates Limited is Brit UW Ltd. (100%)(same address.)

Brit UW Ltd. is a wholly-owned subsidiary of Brit Underwriting Holdings Ltd. Brit Underwriting Holdings Ltd. is a wholly-owned subsidiary of Brit Insurance Holdings Ltd. which in turn is a wholly-owned subsidiary of Brit Overseas Holdings S.à.r.l.. Brit Overseas Holdings S.à.r.l. is a wholly-owned subsidiary of Brit Group Holdings B.V. which in turn is a wholly-owned subsidiary of Brit Insurance Holdings N.V. Brit Insurance Holdings N.V.'s ordinary shares are listed on the London Stock Exchange; it is a member of the FTSE 250 Index.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER:**

The policy of insurance at issue in this action was delivered in Ridgeland, South Carolina, and the events giving rise to this action arose in Ridgeland, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

**ANSWER:**

Upon information and belief, no.

*- Signature on Next Page -*

Respectfully submitted this 4<sup>th</sup> day of August, 2010.

COZEN O'CONNOR

By: /s/ Tracy L. Eggleston

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